

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
AT CINCINNATI

JOHN KLOSTERMAN,	:	Civil Action No. 1:25-cv-00312-SJD-KLL
	:	(Judge Susan J. Dlott)
Plaintiff,	:	(Magistrate Judge Karen L. Litkovitz)
	:	
v.	:	
	:	
KONZA, LLC, et al.,	:	
	:	
Defendants.	:	
	:	

**DEFENDANTS KONZA, LLC, RICHARD BOYDSTON, AND
DENTONS BINGHAM GREENEBAUM LLP'S
MOTION TO DISMISS PURSUANT TO RULES 12(B)(1) AND 12(B)(6)**

Pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, Defendants Konza, LLC, Richard Boydston, and Dentons Bingham Greenebaum LLP (collectively the "Boydston Defendants") respectfully request that this Court dismiss the claims alleged against them in the Amended Complaint of Plaintiff John Klosterman for lack of subject-matter jurisdiction and failure to state a claim upon which relief can be granted. The Boydston Defendants contemporaneously submit a Memorandum in support of this Motion.

Dated: August 1, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been filed electronically with the U.S. District Court, Southern District of Ohio this 1st day of August, 2025. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

The following parties will be served by ordinary United States mail, first class postage prepaid:

Tri-State Organization, Inc.
[no address given by Plaintiff
and no summons filed]

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/s/James D. Houston
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